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ATTORNEYS AT LAW

November 19, 2013

Marlene H. Dortch Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

> Re: Numbering Policies for Modern Communications, WC Docket No. 13-97, IP-Enabled Services, WC Docket No. 04-36, Telephone Number Requirements for *IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Intercarrier* Compensation Regime, CC Docket No. 01-92, Connect America Fund, WC Docket No. 10-90, Numbering Resource Optimization, CC Docket No. 99-200, Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources, Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules

Dear Ms. Dortch:

Pursuant to Paragraph 101 of the Notice of Proposed Rulemaking, Order, and Notice of *Inquiry* issued in the above captioned proceedings on April 18, 2013 ("Numbering Order"), Vonage hereby submits its Fourth Report on its numbering trial. Under the *Numbering Order*, the initial report is due sixty (60) days after Vonage requests direct access to numbers. After the initial report, ongoing reports are due monthly during the course of the trial. Vonage filed its initial report on the trial on August 19, 2013, its second report on September 19, 2013, and its third report on October 24, 2013.

As of this report, Vonage provides the following information for the specific reporting categories in Paragraph 103 of the *Numbering Order*.

1. Total of new numbers placed in service: 1.343

 116.509^{1} 2. Total number of port-in requests (including migration of existing

There are also 229 port-in requests currently pending. In addition, there have been 56 port-in requests that were rejected due to the customer providing insufficient information to meet the losing carrier's validation requirements, 14 port-in requests that were cancelled by the requesting customer prior to the port being executed, and 9 port-in requests were cancelled

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customers and newly won customers):

3. Percentage of successful port-ins: 100%

4. Total number of port-out requests for directly held numbers: 247²

5. Percentage of successful port-outs: 100%

6. Total number of routing failures: None

7. Description of any billing or compensation disputes: None

The above information is for the Atlanta and Boston markets. Because Vonage was not able to reach agreement with CenturyLink, the relevant RBOC in the Phoenix market, to ensure that routing of PSTN traffic to telephone numbers directly held by Vonage will work properly, Vonage decided not to move forward in the Phoenix market. In lieu of migrating customers in the Phoenix market, Vonage migrated additional customers in the Atlanta and Boston markets to numbers held directly by Vonage.³

If you have any questions, please do not hesitate to contact me at (202) 730-1346 or bstrandberg@wiltshiregrannis.com.

Sincerely,

Brita D. Strandberg

Counsel to Vonage Holdings Corp.

cc: William Dever Lisa Gelb Marilyn Jones Ann Stevens Sanford Williams

because YMax Communications has, thus far, refused to cooperate to enable direct porting to Vonage. We are currently in the process of porting these numbers to our CLEC partner in the trial – Peerless Networks. We will then migrate these numbers from Peerless to Vonage.

There are also 132 port-out requests currently pending. In addition, there were 5 port-out requests rejected because the requested number was not a Vonage number.

See Letter from Brita D. Strandberg, Wiltshire & Grannis, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 13, 97, WC Docket No. 04-36, WC Docket No. 07-243, CC Docket No. 95-116, CC Docket No. 01-92, WC Docket No. 10-90, CC Docket No. 99-200 (originally filed October 29, 2013; revised version filed October 30, 2013).